

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JUAN PEREZ,	)	
Plaintiff,	)	
v.	)	CIVIL ACTION FILE NO.
	)	1:16-cv-00902-SCJ
COBB COUNTY and THOMAS	)	
BASTIS, in his individual and	)	
Official Capacities	)	
Defendants.	)	

**CONSENT MOTION TO EXTEND DEADLINES FOR  
INITIAL FILINGS**

COME NOW Defendants in the above-styled case and, pursuant to Fed. R. Civ. 12(B)(6) and LR 7.1, NDGa., move the Court, with Plaintiff's consent, in the interest of judicial economy, and for the parties' and witnesses' convenience, to extend the initial filings deadlines for the Rule 26 Conference (LR 16.1, NDGa.), the filing of the Joint Preliminary Planning Report and Discovery Plan (LR 16.2, NDGa.), and Initial and Expert Disclosures (LR 26.1, NDGa.) to be due 30 days after the Court's Order on Defendants' pending Motion to Dismiss Plaintiff's First Amended Complaint. Again, Plaintiff consents to this modest modification to the litigation scheduling.

## **CERTIFICATE OF TYPE STYLE**

This document was prepared using Times New Roman 14 point font.

Respectfully submitted this 22<sup>nd</sup> day of June, 2016.

COBB COUNTY ATTORNEY'S OFFICE  
Attorneys for Defendant(s)

By: /s/Austin D. Roberson  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the Consent Motion to Extend Deadlines for Initial Filings with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys of record:

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This the 22<sup>nd</sup> day of June, 2016.

[Signature on Following Page]

COBB COUNTY ATTORNEY'S OFFICE

Attorney for Defendants

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**ORDER**

Having read and considered Defendants Cobb County and Thomas Bastis' Motion to extend the initial filings deadlines for the Rule 26 Conference (LR 16.1, NDGa.), the filing of the Joint Preliminary Planning Report and Discovery Plan (LR 16.2, NDGa.), and Initial and Expert Disclosures (LR 26.1, NDGa.) to be due 30 days after the Court's Order on Defendants' pending Motion to Dismiss Plaintiff's First Amended Complaint, the Court hereby **GRANTS** said consent motion.

These initial filings for all parties will be due 30 days after the Court's ruling on the Defendants' Motion to Dismiss.

**SO ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2016.

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HON. STEVEN C. JONES  
JUDGE, UNITED STATES DISTRICT COURT

Presented by:

By: /s/Austin D. Roberson  
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